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## UNITED STATES DISTRICT COURT

### **DISTRICT OF NEVADA**

Plaintiff,

USAA GENERAL INDEMINITY
COMPANY, a foreign corporation doing business in Nevada, DOES I through X and ROE CORPORATIONS XI through XX,

Defendants.

CASE NO: 2:18-cv-00051-JAD-EJY

ECF No. 134

# STIPULATION AND ORDER TO EXTEND THE DEADLINE TO FILE JOINT PRETRIAL ORDER

(Second Request)

IT IS HEREBY STIPULATED, by and between the parties through their undersigned counsel of record, WILLIAM W. McGAHA, ESQ. of the law firm SCHUETZE, McGAHA, TURNER & FERRIS, PLLC, counsel for Plaintiff and ROBERT FREEMAN, ESQ. of the law firm LEWIS BRISBOIS BISGAARD & SMITH, LLP, on behalf of the Defendant, as follows:

The parties stipulated and respectfully request that this Honorable Court extend the deadline to file the Joint Pretrial Order in this matter thirty (30) days up to Wednesday, July 8, 2022. The current due date is June 6, 2022.

The parties to this action are not making this request for the purpose of unduly

WHEREFORE, the parties respectfully request that this Court extend the time to

1 2 delaying the trial in this matter. The parties are diligently working together to draft the 3 Joint Pretrial Order. The issues in this case are complicated and therefore the JPO is 4 taking up more time than other cases would. This case has a complex history and the 5 parties are working to come up with common understandings to make the trial more 6 7 cooperative. Therefore, the parties require additional time to draft, confer, and resolve the 8 parties' statements pertaining to complex issues of law to be tried and determined at trial 9 within the Joint Pretrial Order. They therefor stipulate to extend the time to file the pretrial 10 order until Wednesday, July 8, 2022. 11 12 13 14 **DATED** this 26<sup>th</sup> day of May 2022.

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file the Joint Pretrial Order as outlined above.

SCHUETZE, McGAHA, TURNER & FERRIS, PLLC.

By /s/William W. McGaha WILLIAM W. McGAHA, ESQ. Nevada Bar #3234 601 S. Rancho Drive, Suite C-20 Las Vegas, Nevada 89106 Attorneys for Plaintiff

**DATED** this 26<sup>th</sup> day of May 2022.

**LEWIS BRISBOIS BISGAARD** & SMITH LLP

By /s/Shirley J. Foster ROBERT W. FREEMAN, ESQ. Nevada Bar #3062 SHIRLEY J. FOSTER, ESQ. Nevada Bar #8069 6385 S. Rainbow Boulevard, #600 Las Vegas, Nevada 89118 Attorneys for Defendant

## **ORDER**

IT IS SO ORDERED.

U.S. District Judge Jennifer A. Dorsey Dated: 6-1-2022

#### **Donna Brand**

From:

Foster, Shirley <Shirley.Foster@lewisbrisbois.com>

Sent:

Thursday, May 26, 2022 2:55 PM

To:

Bill McGaha

Cc:

Donna Brand; Freeman, Robert; Freeman, Kristen

Subject:

RE: Zervas v. USAA

Thanks. Ok to file.

From: Bill McGaha <a href="mailto:smlvlaw.net">bmcgaha@smlvlaw.net</a> Sent: Thursday, May 26, 2022 2:53 PM

To: Foster, Shirley <\$hirley.Foster@lewisbrisbois.com>

Cc: Donna Brand <dbrand@smlvlaw.net>; Freeman, Robert <Robert.Freeman@lewisbrisbois.com>; Freeman, Kristen

<Kristen.Freeman@lewisbrisbois.com>
Subject: [EXT] RE: Zervas v. USAA

Shirley:

Here is the SAO with the date of the 8th of July.

Thank you,

Bill

William W. McGaha, Esq.

Legalride, L.L.C.

Schuetze, McGaha, Turner & Ferris, P.L.L.C.

601 South Rancho Drive, Suite C-20 Las Vegas, Nevada 89106

Phone (702) 369-3225 Facsimile (702) 369-2110 Direct Dial (725) 228-3231

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From: Foster, Shirley < Shirley.Foster@lewisbrisbois.com >

Sent: Thursday, May 26, 2022 2:22 PM
To: Bill McGaha < <a href="mailto:bmcgaha@smlvlaw.net">bmcgaha@smlvlaw.net</a>>

Cc: Donna Brand <a href="mailto:dbrand@smlvlaw.net">dbrand@smlvlaw.net</a>; Freeman, Robert <a href="mailto:Robert.Freeman@lewisbrisbois.com">Robert.Freeman@lewisbrisbois.com</a>; Freeman, Kristen